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8	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS
9	STATE OF CALIFORNIA
10	In the Matter of the Accusation Against: Case No. 2011-478
11	ACCHÉATION
12	CHERIE MAROUSE AKA SHUNZHI ZHOU
13	1142 S. Diamond Bar Blvd., # 210 Diamond Bar, CA 91765
14	
15	Registered Nurse License No. 535750
16	Respondent.
17	Complainant alleges:
18 "	<u>PARTIES</u>
19	1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20	official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),
21	Department of Consumer Affairs.
22	Registered Nurse License
23	2. On or about August 21, 1997, the Board issued Registered Nurse License Number
24	535750 to Cherie Marouse, aka Shunzhi Zhou ("Respondent"). The registered nurse license was
25	in full force and effect at all times relevant to the charges brought herein and will expire on
26	December 31, 2012, unless renewed.
27	/// .
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	1

ACCUSATION

STATUTORY PROVISIONS

- 3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.
- 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.
 - 5. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- (a) Unprofessional conduct, which includes, but is not limited to, the following:
- (4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action....

COST RECOVERY

6. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINE

(Disciplinary Action by the Virginia State Board of Nursing)

7. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a)(4), on the grounds of unprofessional conduct, in that she was disciplined by the Virginia State Board of Nursing ("Virginia Board"), as follows:

- On or about August 14, 2008, pursuant to a Consent Order, in the disciplinary action . 8. entitled Before the Virginia Board of Nursing, In Re: Cherie S. Marouse, R.N., the Virginia Board issued a REPRIMAND on Respondent's nursing license.
 - The Virginia Board based its Order on the following facts: 9.
 - On or about March 2008, Respondent was employed as an RN at Mary Washington Hospital, located in Fredericksburg, Virginia.
 - On or about March 23, 2008, while on duty at the hospital, Respondent failed to complete two required assignments of a mother and her baby but documented having completed them.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

Respondent is subject to discipline under Code section 2761, subdivision (a), on the 10. grounds of unprofessional conduct, Respondent committed acts constituting unprofessional conduct, as more particularly set forth in paragraphs 7 through 9, above.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 535750, issued to Cherie Marouse, aka Shunzhi Zhou;
- Ordering Cherie Marouse, aka Shunzhi Zhou to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,
 - Taking such other and further action as deemed necessary and proper. 3.

DATED: Movember 23, 200

Interim Executive Officer

Board of Registered Nursing Department of Consumer Affairs

State of California

Complainant

LA2010504833